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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GABRIELLE CLARK,
individually and as parent and
guardian of WILLIAM CLARK
and WILLIAM CLARK,
individually,

Plaintiffs

v.

STATE PUBLIC CHARTER SCHOOL
AUTHORITY, DEMOCRACY PREP
PUBLIC SCHOOLS, DEMOCRACY PREP
PUBLIC SCHOOLS, INC., DEMOCRACY
PREP at the AGASSI CAMPUS,
DEMOCRACY PREP NEVADA LLC,
SCHOOL BOARD of Democracy Prep at
the Agassi Campus, NATASHA TRIVERS
individually and in her official capacity as
Superintendent and CEO, ADAM
JOHNSON, individually and in his official
capacity as Executive Director and
Principal, KATHRYN BASS individually
and in her capacity as Teacher, JOSEPH
MORGAN, individually and in his official
capacity as Board Chair, KIMBERLY
WALL individually and in her capacity as
assistant superintendent, and John & Jane
Does 1-20

Defendants.

Case No. 2:20-cv-02324-APG-VCF

**DECLARATION OF WILLIAM
CLARK**

DECLARATION OF WILLIAM CLARK

I, William Clark, declare as follows:

1. I am over 18 years of age and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. Attached to this declaration are three (3) true and accurate copies of graded assignments from the "Sociology of Change" class at issue. The required assignments remained in my own GoogleDoc database that DPAC has access to, where class assignments are stored and submitted for grading and monitored by the school. These assignments are still there now in the form they are exhibited herein.

3. These assignments which were "graded for completion" for 10 or 20 points substantiate everything I said in the Complaint filed on December 22, 2020 and in my Declaration attached to the motion filed on January 19, 2020. These assignments correspond to the classes I describe in the Complaint and are referred to in the Complaint slide exhibits, so it is nothing new and it is something the school had this whole time.

4. I partially completed the graded assignment, attached hereto as **Exhibit 1**, on or about August 27, 2020 when the assignment was dated, leaving blank the question "How can a member of a dominant group be unconsciously oppressive" because any answer presumes collective guilt based on race and sex and individual responsibility without intent. These assumptions, although endorsed by the school, my teacher, and class at issue, are racist and sexist so I did not answer it. The questions I did answer have not changed since answering them and the GoogleDocs database shows that with date of last edits.

5. For the question "Is reverse racism real" I answered "Yes" even though I knew my answer was "wrong" according to the DPAC's class ideology, because that is what I believe. As the Complaint describes, I said this beforehand in class too which caused hostility, and the teacher cut off the conversation because she disagreed with me and some others who

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1 said the same. I also added white against black racism “carries more weight” because that is
2 what I believe and I thought it was more what the teacher wanted to hear for that question.

3 6. I did not answer the question “what is some unlearning you have to do?”
4 because the question presumed that my identities and beliefs about race, sex and religion, as
5 well as my mother’s, were “oppressive ideologies,” “privileged” and “prejudices” per the class
6 materials that should be discarded and replaced with the school’s ideology. That is why I did
7 not answer this question even though I knew what kind of answer the teacher wanted, given
8 the class material that is exhibited in our Complaint. I understood that by not answering
9 questions I would be penalized since the assignments were “graded for completion.”

10 7. I did not do the graded homework assignment “How I rise” due by September
11 21, 2020, attached hereto as **Exhibit 2**, even though I attended that specific class as described
12 in the Complaint. I did not want to label and identify my identities and there was no way to
13 do the assignment without labeling and identifying my identities.

14 8. I did not do the graded, in class assignment “Do Now”, attached hereto as
15 **Exhibit 3**, for a class I attended. This “Independent Reflection” is discussed and exhibited in
16 the Complaint slides. It is this graded, written “independent reflection” exercise that we had
17 to submit into the shared GoogleDoc database like all other assignments. Again, I did not want
18 to “label and identify” my racial, sexual, gender and religious identities for the purpose of
19 attaching “privilege” or “oppression” to them. I also just did not want to submit and reveal
20 my identities because that is private.

21 9. I also did not want to submit and answer the questions about the “amount of
22 privilege of oppression you have attached to your identities” or the other questions about how
23 the exercise made me “feel,” since I did not want to do the offensive, invasive exercise in the
24 first place, even if it meant a grade penalty. The assignment told us to discuss these questions
25 and answers with others “in your breakout groups,” which again I did not want to do because
26 it is private and presumed racist, sexist, and religious stereotyping that I did not want to
27 assume and affirm in order to complete the assignment.

1 10. As I said in the Complaint and my prior Declaration, this ideology which
2 included labeling and identifying identities, offensive stereotypes and collective guilt of
3 individuals was the only ideology we had to internalize in the class. The class was not a
4 “survey” of sociologies. Everything had to be interpreted through this racist and sexist
5 ideology that the school endorses but which is objectively hostile and offensive.

6 11. I am still in the college application process at this moment.

7 12. Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of
8 the State of Nevada that the foregoing is true and correct.

9 Dated this 16th day of February, 2021.

10
11 William Clark
12 WILLIAM CLARK
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Exhibit 1

“Sociology of Change” Graded Assignment

August 27 - Four "I"s Classwork

Directions: Follow along with the lecture and answer the questions below. Use a different BUT readable font for answering. Due at the end of class!

Do Now:

1. How did yesterday's independent work go? Was the lesson effective - do you understand how to research on Google Scholar and create Guiding Questions? I haven't completed it yet.
2. Highlight the option you want (majority rules on this one). Would you rather have our weeks scheduled as option A or option B?
 - a. Monday (synchronous) - CTW project day, Wednesday (asynchronous) - SOC Content, Thursday (synchronous) - SOC Content + discussions
 - b. Monday (synchronous) - SOC Content, Wednesday (asynchronous) - CTW project day, Thursday (synchronous) - SOC Content + discussions

Ideological

1. Name 3 dominant group characteristics
 - a. Intelligent
 - b. hard working
 - c. stronger
2. Name 3 submissive group characteristics
 - a. Stupid
 - b. lazy
 - c. weak

Institutional

1. Is institutional oppression always intentional? Not always. It can be unnoticed by any both submissive and/or dominant groups.
2. Graph 1: what do you notice? List at least 3 observations below.
 - a. All other races make less money than white men
 - b. Hispanic women make less money of all
 - c. This graph is from 2018
3. Graph 2: what do you notice? List at least 3 observations below.

c. This graph is from 2018

3. Graph 2: what do you notice? List at least 3 observations below.

- a. African-Americans have the highest incarceration rate
- b. Asians have the lowest incarceration rate
- c. This graph is from 2010

Interpersonal

1. How can a member from the dominant group be unconsciously oppressive?

Side-ish Note

1. Is reverse racism real? Why or why not? Reverse racism is real, but doesn't carry the same weight as a white person oppressing a black person.

We Have A Lot Of Unlearning To Do

1. What is some unlearning you have to do?

Practice!

Highlight which of the Four "I"s of oppression the following statements are an example of.

1. Stating "Girls are bad drivers" when Ms. Bass crashes her car
 - a. Ideological
 - b. Institutional
 - c. Interpersonal
 - d. Internalized
2. Mothers get more maternity leave than Dads get for paternity leave
 - a. Ideological
 - b. Institutional
 - c. Interpersonal
 - d. Internalized
3. Thinking the United States of America is more advanced and superior to any other country
 - a. Ideological
 - b. Institutional
 - c. Interpersonal
 - d. Internalized
4. Believing you are beneath someone else because of your identity
 - a. Ideological

- c. Interpersonal
- d. Internalized

Exit Ticket

1. Choose 1 of the 4 types of oppression - define it in your own words and give an example!

Interpersonal oppression is when one face oppression directly from another individual.

ONCE YOU HAVE COMPLETED THIS ASSIGNMENT, TURN IT IN ON GOOGLE CLASSROOM BY 12 PM TODAY!

Exhibit 2

“How I Rise”

HOW I RISE

DUE Wednesday, September 21 @ 11 AM

I am (enter race)

I am (enter gender)

I am (enter socioeconomic status)

I am (enter sexual orientation)

I am (enter disabilities - if any)

I am (enter religion - if you have one)

I am (enter age)

I am (enter language[s] you speak)

And that is enough.

And the realities stated above do not define me, but they are a part of me, and I embrace it.

And when it gets to be too much, when the world keeps crashing down on me, this is how I will
RISE:

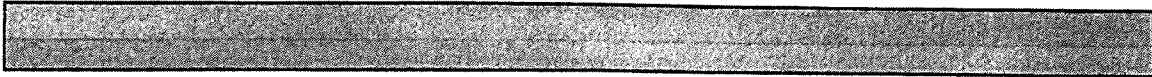


Exhibit 3

“Do Now”

DO NOW

When you think of oppression, what comes to mind?

Independent Reflection Part 1

Fill in your own cultural identity labels

Race / Ethnicity / Nationality:

Gender:

Socioeconomic status:

Sexual Orientation:

Disabilities:

Religion:

Age:

Language:

Independent Reflection Part 2

Look back on your answers for part 1 and now add in whether or not those identities have privilege or oppression attached to them.

Discussion Questions

Answer these independently first, then discuss answers in your breakout groups.

1. How did this activity make you feel?
2. Did you learn anything about yourself?
3. Were you surprised with the amount of privilege or oppression that you have attached to your identities?
4. Why do you think it is important to learn about your identities?
5. How can identities connect to social movements?

Why is knowing your identity important?

I have given you some reasons as to why knowing your identity is important - now you tell me why you personally think this is important to know and how this will help you in the future?